

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

*Plaintiffs,*

v.

STATE OF TEXAS, *et al.*,

*Defendants.*

HARRIS COUNTY REPUBLICAN PARTY, *et al.*,

*Intervenor-Defendants.*

CIVIL ACTION NO.

5:21-cv-844-XR

[Consolidated Action: Lead Case]

**LUPE PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF PAGE  
LIMITATION FOR LUPE PLAINTIFFS' OPPOSED MOTION TO STRIKE THE  
DECLARATION OF JONATHAN WHITE AND MOTION *IN LIMINE* TO EXCLUDE  
TESTIMONY ABOUT NON-PUBLIC INFORMATION RELATING TO  
INVESTIGATIONS AND PROSECUTIONS OF ALLEGED VOTER FRAUD**

Pursuant to the Court's Standing Order's instructions on Pretrial Motions<sup>1</sup>, LUPE Plaintiffs respectfully request a ten-page enlargement of the page limitation for LUPE Plaintiffs' Opposed Motion to Strike the Declaration of Jonathan White and Motion *in Limine* to Exclude Testimony About Non-Public Information Relating to Investigations and Prosecutions of Alleged Voter Fraud. The motion is attached as Exhibit A.

LUPE Plaintiffs seek leave to exceed the page limit in order to address fully the factual and legal bases of their motion. Because of the significant overlap between their two requests, which involve testimony of the State's witness Mr. Jonathan White, instead of filing a motion to strike

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<sup>1</sup> Standing Order, found at <https://www.txwd.uscourts.gov/wp-content/uploads/2023/01/Proposed-Scheduling-Order-and-Rule-26f-Report.pdf> (last visited September 1, 2023).

Mr. White's declaration and a separate motion *in limine* to exclude testimony, LUPE Plaintiffs have drafted a single motion that contains arguments for both. This consolidated motion seeks to increase efficiency for State Defendants and the Court.

Granting this motion will not prejudice any party. Counsel for State Defendants and Defendant Intervenors do not oppose this motion.

For the foregoing reasons, LUPE Plaintiffs respectfully request that the Court grant their motion for leave to file a Motion to Strike and Motion *in Limine* of no greater than forty pages.

Dated: September 1, 2023

Respectfully submitted,

/s/ Nina Perales

Nina Perales

Fátima Menéndez

Kenneth Parreno

Julia Longoria

Mexican American Legal Defense and Educational  
Fund (MALDEF)

110 Broadway Street, Suite 300

San Antonio, TX 78205

(210) 224-5476

Fax: (210) 224-5382

nperales@maldef.org

fmenendez@maldef.org

kparreno@maldef.org

jlongoria@maldef.org

*Counsel for LUPE Plaintiffs*

**CERTIFICATE OF CONFERENCE**

I hereby certify that, on August 31, 2023, counsel for LUPE Plaintiffs sent an email to confer with counsel for all parties concerning the subject of the instant motion. Counsel that responded before the filing of this motion, including counsel for State Defendants and counsel for Defendant Intervenors, indicated that they are unopposed.

/s/ Nina Perales

Nina Perales

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 1<sup>st</sup> day of September 2023.

/s/ Nina Perales

Nina Perales